

**V. NUTRITION SERVICES AND ADMINISTRATION (NSA)
EXPENDITURES**

State Agency: Missouri for FY 2014

NSA expenditures involve the process of allocating, documenting and monitoring the distribution of administrative funds to local agencies, including the monitoring of nutrition education costs, and State and local agency direct/indirect costs.

A. Funds Allocation - 246.4(a)(13): describe the policies and procedures used to allocate administrative funds to local agencies, including start-up funds, and conversion of food funds to NSA funds.

B. Local Agency Budgets/Expenditure Plans - 246.4(a)(2): describe the policies and procedures for preparing and submitting local agency budgets and expenditure plans and the services that are entirely supported by WIC Program funds.

C. State and Local Agency Access to Funds - 246.4(a)(12): describe the procedures and method(s) of distribution/reimbursement of NSA funds to local agencies.

D. Reporting and Reviewing of State and Local Agency Expenditures - 246.4(a)(11)(iv) and (12): describe the policies and procedures used to report, monitor and review State and local agencies' expenditures, including the documentation of staff time, local agency report forms, on-site reviews of local agencies' NSA expenditures, and in-kind contributions.

E. Nutrition Education Costs - 246.4(a)(9): describe the plans and procedures used to meet the nutrition education expenditure requirements, including monitoring activities, local agency reports, and assurances that the special nutrition education needs of migrant farmworkers and their families, Indians, and homeless persons are met.

F. Indirect Costs - 246.4(a)(12): describe the policies and procedures used to document and monitor indirect cost rates and services at the State and local level.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

A. Funds Allocation

☐ **DOES NOT APPLY (PROCEED TO NEXT SECTION)**

1. Allocation Process

a. The State agency has established and provided written procedures to local agencies describing the process for allocation of NSA funds among local agencies.

☒ Yes ☐ No

b. Local agencies were involved in developing these procedures via:

☐ task force/committee of selected local agencies
☐ comment on proposals made available to all local agencies
☒ other (describe): Contract Scope of Work describes allocations available and agencies request funds as needed

c. The State agency allocates NSA funds to local agencies through the use of:

☐ a negotiated budget ☒ flat cost per participant Statewide
☐ formula (variable) ☐ other (describe):

d. The allocation procedure takes the following factors into account (check all that apply):

☐ staffing needs ☐ population density
☒ number of participants ☐ cost-containment initiatives
☐ availability of administrative support from other sources
☐ other (specify):

e. The State agency methodology for funds allocations to local agencies includes a mechanism for reallocation.

☒ Yes ☐ monthly ☐ quarterly ☒ semiannually
☐ No ☐ other (specify):

ADDITIONAL DETAIL:

and/or Procedure Manual (citation):

- Contract Scope of Work FFY 14

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

A. Funds Allocation

2. Conversion of Food Funds to NSA Funds

a. The State agency allocates converted food funds to local agencies:

- ☐ at the beginning of the year based on projection
☐ as participation permits (for States that do not submit conversion plan)
☒ other (explain): N/A

b. Local agencies that either meet or exceed participation projections necessary to qualify for food to NSA grant conversion or to support the State agency's conversion plan are rewarded with increases to their NSA grant.

- ☐ Yes ☐ No
☐ Depends (explain):

**ADDITIONAL DETAIL: NSA Expenditures Appendix
and/or Procedure Manual (citation):**

3. The State's Fiscal Year runs from July 1 to June 30

**ADDITIONAL DETAIL: NSA Expenditures Appendix
and/or Procedure Manual (citation):**

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

B. Local Agency Budgets/Expenditures Plans

1. Local Agency Budgets/Expenditure Plans

- a. The State agency requires its local agencies to prepare and submit administrative budgets.

☒ Yes ☐ No ☐ Not Applicable

If yes, the State agency requires that local agency budgets include the same cost categories as those used for State-level budget preparation.

☐ Yes ☒ No

- b. Local agencies' budgets are broken out by (check all that apply):

☐ not applicable

☒ line items

- ☐ accounting
- ☐ ADP services
- ☐ breastfeeding aids
- ☒ capital expenditures
- ☐ clinic/lab services
- ☐ communications
- ☒ employee salaries
- ☒ employee fringe benefits
- ☒ lease or rental of space
- ☐ maintenance and repair
- ☒ materials and supplies
- ☒ memberships, subscriptions, and professional activities
- ☒ printing and reproduction
- ☒ training and education
- ☒ transportation
- ☒ travel
- ☒ other (specify): Contract Services; Medical Materials; Facility Costs; Indirect Costs; Equipment Purchases; computer Hard/Software; Nutrition Materials

☒ functions

- ☒ general administration/program management
- ☐ food delivery
- ☐ certification
- ☒ nutrition education
- ☒ breastfeeding promotion/support (e.g., breastfeeding aids)
- ☒ client services
- ☐ other (specify):

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

B. Local Agency Budgets/Expenditures Plans

- c. **The State agency has an established formal process for local agencies to follow when requesting amendments or modifications to their budgets.**

☒ Yes ☐ No ☐ Not Applicable

- d. **In order to prepare the federally required WIC administrative budget, the State agency:**

- ☒ uses local agency budgets or prior year expenditures
☐ reports under an ongoing system to collect this data
☐ extracts or consolidates data reported under other State or local agency systems to group costs under the federal line items and functions
☐ other (describe):

(State WIC administrative budgets are not submitted to FNS, but are used by State agencies as a management tool and may be reviewed by FNS.)

ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation):

WOM Policies:

- ER#1.03300 Monthly Administrative Cost Reports
- ER#1.03400 Line Item: Personnel Compensation
- ER#1.03500 Line Item: Personnel Benefits
- ER#1.03600 Line Item: Contract Services
- ER#1.03700 Line Item: Conference & Training
- ER#1.03800 Line Item: Travel
- ER#1.03900 Line Item: Equipment Purchases
- ER#1.04000 Line Item: Nutrition Materials/Breastfeeding Promotion
- ER#1.04100 Line Item: Administrative Office Costs
- ER#1.04200 Line Item: Medical Materials
- ER#1.04300 Line Item: Computer Hardware/Software
- ER#1.04400 Line Item: Facilities Costs
- ER#1.04500 Line Item: Indirect costs
- ER#1.04600 Line Item: Special Grants

2. **Please indicate below the services that are entirely supported by WIC funds:**

- ☒ Anthropometric measurements
☒ Nutrition counseling/education
☒ Breastfeeding promotion/support
☒ Immunization status assessments
☒ Referrals to health and/or social services
☒ Hematological assessments

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

B. Local Agency Budgets/Expenditures Plans

☐ Other (specify):

**ADDITIONAL DETAIL: SA/LA Spending Plan Appendix
and/or Procedure Manual (citation):**

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

C. State and Local Agency Access to Funds

1. The State Agency manages its NSA Grant on a/an:

- ☐ cash basis ☒ accrual basis
☐ other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

2. Reimbursement/Provision of Funds to Local Agencies

a. The State agency provides local agencies with funds in advance.

- ☒ Yes (state conditions): In order to have WIC Services available in all areas of the state; an agency may request and be approved for an advance. An example is a community action organization without other available funding.
☐ No
☐ Not Applicable (Proceed to next section.)

If yes, advances must be reconciled to incoming claims. Local agency claims are submitted:

- ☒ Monthly ☐ Quarterly

b. In order to qualify for payment, an expenditure must be (check all that apply):

- ☒ at or below the level of its approved budget line item
☒ supported by appropriate documentation (e.g., check or receipt)
☒ a reasonable and necessary expense for WIC
☐ other (specify):

c. If an expenditure exceeds the budget provided for that particular line item, the State agency requires the local agency to (check all that apply):

- ☐ submit a supplemental request
☒ provide a justification for exceeding the budget line item
☒ make an offsetting adjustment to another line item in its budget
☒ request approval of a budget modification
☐ other (explain):

d. Local agencies receive payment via:

- ☒ electronic funds transfer ☐ State treasury check/warrant
☐ other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

1. Documentation of Staff Time

- a. How does the State agency determine the percentage of staff time devoted to WIC tasks to document allowable staff costs under the WIC Program (check all that apply):

At SA

☒☐☐☐☐

At LA

☒☐☐☐☐

100 percent reporting

Random moment sampling

Periodic time studies:

1 week/month

1 month/quarter

other (specify):

- b. The State agency last evaluated its time documentation protocol on —state continuously evaluates the protocol 2. If available, please attach a copy of the protocol to this section or cite Procedure Manual reference.

ADDITIONAL DETAIL: NSA Expenditures Appendix NA and/or Procedure Manual (citation):

- Missouri Dept of Health and Senior Services Administrative Manual 15.5 Time Coding page 4 of 8

2. Local Agency Report Forms

- a. The State agency specifies standard forms and/or procedures for local agencies to use in reporting monthly local-level expenditures.

☒

Yes

☐

No

☐

Not Applicable (Proceed to next section)

- b. If a standard form is used, it requires local agencies to report NSA expenditures by:

☒

same categories as local agency budget

☐

other format which includes:

☐

line items

☐

accounting

☐

ADP services

☐

breastfeeding aids

☐

capital expenditures

☐

clinic/lab services

☐

communications

☐

employee salaries

☐

employee fringe benefits

☐

lease or rental of space

☐

maintenance and repair

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

- ☐ materials and supplies
- ☐ memberships, subscriptions, and professional activities
- ☐ printing and reproduction
- ☐ training and education
- ☐ transportation
- ☐ travel
- ☐ other (specify):

- ☐ **functions**
- ☐ general administration/program management
 - ☐ food delivery
 - ☐ certification
 - ☐ nutrition education
 - ☐ breastfeeding promotion/support (e.g. breastfeeding aids)
 - ☐ client services
 - ☐ other (specify):

- ☐ **other** (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

3. On-Site Review of Local Agencies' Administrative Expenditures

a. The State agency conducts on-site reviews of local agency administrative expenditures:

- ☐ annually ☒ every two years ☐ every three years
☐ other (specify):

The review is conducted by:

- ☒ WIC State agency staff
☐ State Department of Health fiscal or audit staff
☐ CPA or audit firm
☐ other (specify):

b. The State agency utilizes a standard format/guide to review local agencies' NSA expenditures.

- ☒ Yes ☐ No

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

If yes, the standard review guide includes the following procedures (check all that apply):

- ☒ verification of at least one monthly billing/claim/expenditure report against source documents
- ☒ tracking written approval of procurements
- ☒ requesting records of ordering, receipt, billing, and payment
- ☒ determination that costs were necessary, reasonable and appropriate
- ☒ determination that costs were properly allocated among WIC and other programs
- ☒ determination that personnel costs charged to WIC were appropriate
- ☒ determination that local agencies' indirect costs were appropriately charged
- ☐ other (specify):

c. If available, please attach a copy of the State agency's NSA expenditure review guide.

- WIC Invoice Review Form
- Internal Process Review of Monitor Forms

d. The State agency notifies local agencies of findings and establishes claims for unallowable costs, as appropriate.

☒ Yes ☐ No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

- Reimbursement to State Internal Process

4. The State agency requires local agencies to document the sources and values of in-kind contributions.

☒ Yes ☐ No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

- ER#1.04700 In-Kind Costs

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

E. Nutrition Education Costs

1. The State agency documents that it meets its nutrition education and breastfeeding promotion expenditure requirements per 7 CFR 246.14(c)(1) via:

☐ activity reports ☐ time studies ☐ itemizing expenditures
☒ other (specify): Reports from the Invoicing Application, Reporting Categories and Object Code designation in the state accounting system.

**ADDITIONAL DETAIL: NSA Expenditures Appendix
and/or Procedure Manual (citation):**

2. The State agency monitors expenditures for the following activities related to breastfeeding promotion and support at the State and/or local level (check all that apply):

	At SA	At LA
breastfeeding promotion coordinator's salary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
written educational materials	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
participant education/counseling	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
staff training	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
breastfeeding promotion activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
direct support costs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
breastfeeding aids and equipment (e.g., breast pumps purchased with NSA funds)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
other	<input type="checkbox"/>	<input type="checkbox"/>
(if other, specify):		

**ADDITIONAL DETAIL: NSA Expenditures Appendix
and/or Procedure Manual (citation):**

3. In the event that the State agency uses funds from other sources in meeting minimum expenditure requirements for nutrition education (NE) and breastfeeding promotion and support (BFPS), please provide below the source of these funds, the amount, and the method the State agency will use to document the use of these NE and BFPS funds. (Federal WIC food funds used to purchase/rent breast pumps, and expenditures from breastfeeding peer counseling funds, cannot be counted toward the nutrition education and breastfeeding expenditure requirement.)

Source	Amount
<u>NA</u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

E. Nutrition Education Costs

Method(s):

- ☐ activity reports ☐ time studies ☒ itemizing expenditures
☐ other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

4. Local agencies report nutrition education and breastfeeding promotion and support costs:

- ☒ when they report routine NSA costs
☐ through a different system (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

F. State and Local Agency Indirect Costs

1. Indirect Cost Rate and Services

- a. Please list below indirect cost/cost allocation agreements in which the State agency is included:

See Attachment- Missouri Letter Indirect Cost

- b. The State agency's indirect cost rate(s) is 20.8 % and is based on:

☐ salaries ☐ direct costs for administration ☐ both
☒ other (specify): Salaries and Fringe Benefits

- c. Please cite the effective date of the State agency's current negotiated agreement and/or cost allocation plan for indirect costs: 2/13/2013.

- d. The State agency receives the following types of services under the indirect cost rate agreement(s):

<input checked="" type="checkbox"/> budgeting/accounting	<input checked="" type="checkbox"/> personnel/payroll
<input type="checkbox"/> ADP	<input checked="" type="checkbox"/> space usage/maintenance
<input checked="" type="checkbox"/> communication/phone/mail	<input checked="" type="checkbox"/> central supply
<input checked="" type="checkbox"/> legal services	<input checked="" type="checkbox"/> procurement/contracting
<input type="checkbox"/> printing/publication	<input checked="" type="checkbox"/> audit services
<input type="checkbox"/> equipment usage/maintenance	<input type="checkbox"/> other (specify):

- e. The State agency allows local agencies to report indirect costs.

☒ Yes ☐ No ☐ Not Applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

- ER #1.04500 Line Item: Indirect Costs

2. Review of Indirect Cost Documentation

- a. The State agency and local agencies ensure that services received and paid for through indirect costs benefit WIC and are not also charged directly to WIC by comparing direct charges by line item to a listing of services paid by funds collected through the application of the indirect cost rate:

☒ Done for State agency level indirect costs (frequency): Every other year
☐ Done for local agency level indirect costs (frequency): _____
☐ Not done at either level: ____

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

F. State and Local Agency Indirect Costs

- b. State and local agency WIC management have access to and review the following documents as applicable to ensure that indirect cost services are not also charged directly to WIC (check all that apply):**

	At SA	At LA
indirect cost agreements/plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>
the accounting mechanism used to ensure the propriety of indirect cost charges	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a copy of the cost allocation plan	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
a list of all services paid from indirect costs	<input type="checkbox"/>	<input type="checkbox"/>
other documentation related to the establishment and charging of indirect costs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
not applicable	<input type="checkbox"/>	<input type="checkbox"/>

- c. When the State agency reviews the local agencies' indirect cost rate agreements, the review includes (check all that apply):**

- ☒ required submission of indirect cost agreement by the local agency to the State agency
- ☒ assessment of how the rate or method is applied (correct time period, percentage, and base)
- ☐ verification that the State agency had previously approved the local agency to negotiate such an agreement
- ☐ post-review or audit to ensure the rate was applied correctly
- ☒ other documentation related to the establishment and charging of indirect costs (list): HHS Letter of Agreement
- ☐ not applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):